

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Case No.

Timothy Terrell JOHNSON

Case: 2:22-mj-30537
Assigned To : Unassigned
Assign. Date : 12/19/2022
Description: COMP USA V.
SEALED MATTER (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 20, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 19, 2022

City and state: Detroit, Michigan


Complainant's signature

Special Agent Michael Jacobs, ATF
Printed name and title


Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Special Agent Michael Jacobs, being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND, TRAINING, AND EXPERIENCE

1. I have been employed as a Special Agent with the Bureau of Alcohol Tobacco, Firearms and Explosives (ATF) since March of 2016. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. I have a bachelor's degree in Criminal Justice.

2. During my time at ATF, I have authored numerous Federal search warrants, Federal criminal complaints, and Federal arrest warrants. Before my employment with ATF, I was a Police Officer with the Wayne State University Police Department for approximately eight years. During my time with the Wayne State University Police Department, I was assigned to the Federal Bureau of Investigation (FBI) Detroit Violent Crimes/Violent Gangs Task Force (VCTF/VGTF) for approximately two years and the Detroit FBI Narcotics Conspiracy Task Force (Detroit Conspiracy One) as a Task Force Officer (TFO) for approximately two years.

3. As an FBI TFO and Special Agent with the ATF, I have participated in numerous state and federal investigations, including investigations concerning narcotics trafficking, illegal firearms possession, Hobbs Act robberies, RICO and other conspiracies, non-fatal shootings, homicides, and kidnapping. Because of my involvement in these and other investigations, I have sworn to a number of federal search and arrest warrants. Through my training, education, and experience, I have also become familiar with how criminals communicate and operate their clandestine activities.

4. This affidavit is based on my personal observations, my training and experience, and information obtained from other agents, police officers, informants and witnesses. This affidavit merely establishes sufficient probable cause for the requested warrant and does not set forth all the facts known to law enforcement regarding this investigation.

5. I am conducting an investigation of, Timothy Terrell JOHNSON, (Date of Birth of XX/XX/XX91).

6. I reviewed a criminal history check relating to Timothy Terrell JOHNSON. JOHNSON was found to be convicted of the following felony offenses:

- a. 2013- 3rd Circuit Court, Detroit, Michigan: Count-1 Felony Home Invasion; Count-2 Felony Home Invasion.
- b. 2013- 3rd Circuit Court, Detroit, Michigan: Count-1 Felony Home Invasion.
- c. 2016- United States District Court for the Eastern District of Michigan, Violation of 18 U.S.C. 922(g)(1) Felon in Possession of a Firearm.
- d. 2021- 3rd Circuit Court, Detroit, Michigan: Count-1: Felony Weapons Carrying Concealed,

JOHNSON is also currently on probation for possessing a concealed weapon.

I. PROBABLE CAUSE

7. On November 20, 2022, Officer Joshua Dennard along with Officer Roy Bunnich of the Detroit Police Department, in full police uniform and in a fully marked Detroit Police vehicle, observed a black, 2005 Ford Mustang bearing Michigan license plate number EBA6122 in

the area of Joy Road and Westwood in Detroit, Michigan making illegal right turns. The officers initiated a traffic stop of the vehicle in the area of Dover and Stahelin, Detroit, Michigan for violations of Michigan traffic laws (improper right turns and tinted windows).

8. Officer Bunnich contacted the vehicle driver and sole occupant and identified him as Timothy Terrell JOHNSON, (B/M, Date of Birth of XX/XX/XX91). While speaking to JOHNSON Officer Bunnich observed a firearm (later determined to be an AR-15 Style pistol) behind the vehicles front passenger seat. Officer Bunnich observed the AR style pistol stabilizing brace wedged in between the passenger seat back and the rear seat bottom. The brace was angled toward the driver with the pistol grip facing the floor and the barrel pointing down on an angle. The manner in which the firearm was stored caused Officer Bunnich to believe the firearm appeared to have been placed there in a hurry and by the extension of the right arm of the driver.

9. Officer Bunnich removed JOHNSON from the vehicle and detained him to investigate further. Officer Bunnich then recovered a black Smith and Wesson MP15-22P AR style pistol bearing serial number WAM5858 from the area he had observed it.

10. Officers checked JOHNSON through the Law Enforcement Information Network (LEIN) and determined that he was currently on probation, had a suspended driver's license and was a previously convicted felon. JOHNSON was arrested for illegally possessing the firearm and issued several traffic tickets, the vehicle was impounded, and he was transported to Detroit Police Detention Center.

11. I am an ATF interstate nexus expert. It is my opinion that based on the information listed in the Detroit Police Report and without physically examining the firearm that the Smith and Wesson, Model: MP15-22P, .22LR Caliber, Serial Number: WAM5858, was not manufactured in Michigan and had previously traveled in interstate commerce.

II. CONCLUSION

12. Probable cause exists Timothy Terrell JOHNSON, (Date of Birth of XX/XX/XX91), a prior convicted felon, did illegally possess a firearm in violation of Title 18 United States Code Section 922(g)(1) (Knowing Possession of a Firearm by a Prohibited Person).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Jacobs", written over a horizontal line.

Michael Jacobs, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", written over a horizontal line.

HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: December 19, 2022